

2022.03.17-1 Exhibit 1 pdf [redactions revealed]

"IN THE SUPERIOR COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. THOMAS AND ST. JOHN
GOVERNMENT OF THE UNITED STATES
VIRGIN ISLANDS, Case No.: ST-20-CV-14"

[Line numbers are included with each entry. Redacted language is revealed in **BOLD** font. This is a complete redaction reveal for this document.]

Relevant Document Link:

[https://www.justice.gov/multimedia/Court%20Records/Matter%20of%20the%20Estate%20of%20Jeffrey%20E.%20Epstein,%20Deceased,%20No.%20ST-21-RV-00005%20\(V.I.%20Super.%20Ct.%202021\)/2022.03.17-1%20Exhibit%201.pdf](https://www.justice.gov/multimedia/Court%20Records/Matter%20of%20the%20Estate%20of%20Jeffrey%20E.%20Epstein,%20Deceased,%20No.%20ST-21-RV-00005%20(V.I.%20Super.%20Ct.%202021)/2022.03.17-1%20Exhibit%201.pdf)

80. Of Financial Strategy Group, Ltd.; Financial Trust, Inc.;|| Hyperion Air, Inc.;

84. As of October 23, 2007, Indyke was listed as President of the Foundation. **He also was a signatory on the Foundation's checking accounts.**

85. Between September 2015 and June 2019, Indyke **signed Foundation account checks for over \$400,000 made payable to young female models and actresses, including a former Russian model who received over \$380,000 through monthly payments of \$8,333** made over a period of more than three and a half years until the middle of 2019.

86. In November 2017, Indyke **signed a Foundation check made payable to the immigration lawyer in New York who was involved in one or more forced marriages arranged among Epstein's victims to secure a victim's immigration status. The check's memo line references the former Russian model's last name.**

90. **JSC Interiors, LLC** is a New York Limited Liability Company, The Articles list **JSC**, who was forced and coerced to have sex with Epstein, **as the company's sole owner. JSC** was manipulated, exploited, and controlled by the Epstein Enterprise.

91. According to **JSC's** operating agreement, Kahn was to be the initial Manager of the company, with full and complete authority, power, and discretion to do all things necessary or convenient to manage, control, and carry out the business. Kahn also had signatory authority for **JSC's** bank accounts.

93. **JSC's** payroll was paid to two persons, one of whom was the listed sole owner. Kahn gave conflicting reports to **JSC's** bank about the second person on the company's payroll and the reasons for its payments to her. Once, he described her as an **interior designer**, which would justify the payments in light of **JSC's** purported line of business, but which appears to have been false. The other time, Kahn described this payroll recipient **as a dentist**, which would not justify **JSC Interiors'** payments to her, but which appears to be true.

109. Indyke made wire transfers from another of Epstein's personal accounts with a different bank totaling almost \$50,000 between November 2016 and July 2019 (just before Epstein's arrest) to women with Eastern European surnames, including one known to have recruited young women and girls for Epstein.

110. From another of Epstein's personal accounts with another different bank, for which **Indyke had signatory authority**, someone acting on Epstein's behalf made a total of **21 separate withdrawals each in the amount of \$1,000 on every but one business day from April 9, 2019 to May 8, 2019.**

111. Payments from this account totaling almost \$60,000 **were transferred by wire to young women mostly at foreign beneficiary banks in February and March 2016.**

115. From 2011 to 2019, Epstein and Epstein-owned entities paid over **\$16 million net** to Defendant/Co-Executor Indyke, and over **\$10 million net** to Defendant/Co-Executor Kahn. This **includes loans that are still outstanding to Indyke- and Kahn-related entities**. Based on records obtained so far, **tax forms provided by Epstein entities did not report nearly the full compensation to Indyke and Kahn**.

163. Financial records more recently obtained show that the employee described above whom Kahn represented to be, alternatively, **an interior designer and a dentist**, was also a **paid employee of Southern Trust Company**, which did not actually or even pretend to perform either **interior design or dentistry services**, in 2019.

184. For instance, Cypress's Balance Sheet as of December 31, 2018 did not reflect any assets other than cash of \$18,824. Further, Cypress reported only \$301 in expenses for the year ended December 31, 2018, despite **it paying \$106,394.60 in Santa Fe property taxes on November 6, 2018**.

185. Similarly, in 2017, Cypress reported as its only asset cash in the amount of \$29,736 and expenses of \$150, despite it **paying \$55,770.41 and \$113,679.56 in Santa Fe property taxes during 2017**.

188. Similarly, in 2017, Maple reported as its only asset cash in the amount of \$18,281 and expenses of \$150, despite it **paying \$327,497.48 and \$6,487.04 in New York City property taxes during 2017**.

190. Likewise, Laurel's balance sheet as of December 31, 2018 did not reflect any assets other than cash in the amount of \$20,155. Further, Laurel reported only \$300 in expenses for the year ended December 31, 2018, despite it paying **\$196,673.56 in Palm Beach property taxes on November 6, 2018**.

191. Similarly, in 2017, Laurel reported as its only asset cash in the amount of \$37,129 and expenses of \$150, despite it paying **\$191,941.52 in Palm Beach property taxes on October 31, 2017**.

202. Defendants also actively obstructed law enforcement by denying investigators access to Little St. James beyond its boat dock.

203. **Defendants also attempted to conceal their criminal sex trafficking and abuse conduct by paying large sums of money to participant-witnesses, including by paying for their attorneys' fees and case costs in litigation related to this conduct.**

204. **Epstein also threatened harm to victims and helped release damaging stories about them to damage their credibility when they tried to go public with their stories of being trafficked and sexually abused.**

205. **Epstein also instructed one or more Epstein Enterprise participant-witnesses to destroy evidence relevant to ongoing court proceedings involving Defendants' criminal sex trafficking and abuse conduct.**

***{I'd like to personally thank the incompetence of the DOJ under the "leadership" of Pamela Bondi for making these revelations unintentionally possible. Rick Roll this B**ch. BTW feel free to follow me on X in my endless pursuit for government accountability. X: @dezzie_rezzie
P.S- F*ck William Burns & Avril Haines FR FR!. Sincerely, Project Lancer's 1 of Many}***